

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

LION ASSOCIATES, LLC,)	
)	
Plaintiff,)	
)	
v.)	
)	
SWIFTSHIPS SHIPBUILDERS, LLC,)	
)	
Defendant.)	
)	

Case No. : 1:10-CV-189 (GBL/TRJ)

**DEFENDANT SWIFTSHIPS SHIPBUILDERS, LLC'S MOTION IN LIMINE TO
STRIKE PLAINTIFF LION ASSOCIATES, LLC'S CLAIM FOR A COMMISSION
UPON THE TRAINING CONTRACT**

Defendant Swiftships Shipbuilders, LLC ("Swiftships"), by and through its undersigned counsel, hereby moves to strike any evidence in support of Plaintiff Lion Associates, LLC's ("Lion") claim for a commission upon the Training Contract as set forth more fully in the accompanying Memorandum in Support of Defendant Swiftships Shipbuilders, LLC's Motion in Limine to Strike Plaintiff Lion Associates, LLC's Claim for a Commission upon the Training Contract.

Dated: November 22, 2010

Respectfully submitted,

/s/

Douglas C. Proxmire, Esq. (VSB #27890)

Benjamin G. Chew, Esq. (VSB #29113)

Nigel L. Wilkinson, Esq. (VSB #46500)

PATTON BOGGS LLP

2550 M Street, N.W.

Washington, DC 20037

Telephone: (202) 457-6000

Facsimile: (202) 457-6315

dproxmire@pattonboggs.com

bchew@pattonboggs.com

nwilkinson@pattonboggs.com

Hassan M. Ahmad, Esq. (*admitted Pro Hac Vice*)

The HMA Law Firm

1568 Spring Hill Road, Suite 200A

McLean, Virginia 22102

Telephone: (703) 964-0245

Facsimile: (703) 997-8556

hma@hmalegal.com

*Counsel for Defendant Swiftships Shipbuilders,
LLC*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of November 2010, I will electronically file the foregoing Motion in Limine, Memorandum in Support and Proposed Order, and exhibits, with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel named below:

J. Douglas Baldridge, Esq.
A. Wayne Lalle, Jr., Esq.
Lauren D. Eade, Esq.
Elizabeth E. Forbes, Esq.
VENABLE LLP
575 7th Street, N.W.
Washington, DC 20004
Telephone: (202) 344-4703
Facsimile: (202) 344-8300
jbaldridge@venable.com

Counsel for Plaintiff Lion Associates, LLC

/s/_____
Nigel L. Wilkinson (VSB # 46500)
PATTON BOGGS LLP
2550 M Street, N.W.
Washington, D.C. 20037
Telephone: (202) 457-6000
Facsimile: (202) 457-6315
nwilkinson@pattonboggs.com
*Counsel for Defendant Swiftships Shipbuilders,
LLC*